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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

KLAMATH-SISKIYOU WILDLANDS CENTER,
OREGON WILD, and CASCADIA WILDLANDS,

Case No. 1:20-cv-00952-AA

Plaintiffs,

v.

UNITED STATES FISH AND WILDLIFE
SERVICE, and UNITED STATES BUREAU OF
LAND MANAGEMENT,

JOINT STATUS REPORT

Federal Defendants.

Pursuant to the Court's September 14, 2020 Scheduling Order (ECF Doc. No. 12), Plaintiffs Klamath-Siskiyou Wildlands Center, Oregon Wild, and Cascadia Wildlands, and Federal Defendants, the United States Fish and Wildlife Service and the United States Bureau of Land Management jointly submit the following status report.

The parties have not yet reached an agreement that the administrative record filed by Federal Defendants on November 17, 2020 (*see* ECF No. 13) is complete, and propose extending all briefing deadlines to allow time to address outstanding issues.

Accordingly, the parties request that the Court vacate its September 14, 2020 Scheduling Order (ECF Doc. No. 12), and enter a new scheduling order with the following deadlines:

A. Administrative Record Related Motions.

1. The parties shall file a status report by **February 23, 2021**, notifying the Court whether: (a) they need additional time to resolve issues related to the administrative record; (b) they have reached agreement that the record for judicial review is complete and intend to proceed as set forth below; or (c) Plaintiff intends to move the Court to resolve a dispute regarding the completeness of the Administrative Record, the applicability of any exceptions to record review, or the need for judicial review of extra-record materials.
2. Any motion related to the administrative record shall be filed by Plaintiffs by **March 2, 2021**. Briefing on any such motion shall proceed in accordance with Local Rules. If such a motion is filed, the parties agree that briefing on summary judgment, as contemplated below, should not proceed until disputes over the content of the record are resolved, either by the Court or the parties.

B. Motions for Summary Judgment.

1. Plaintiffs shall file their Motion for Summary Judgment and supporting materials on or before **March 30, 2021**.
2. Federal Defendants shall file their Opposition to Plaintiffs' Motion for Summary Judgment and any Cross-Motion for Summary Judgment on or before **April 27, 2021**.
3. Plaintiff shall file its Reply in Support of their Motion for Summary Judgment and any Opposition to Federal Defendants' Cross-Motion for Summary Judgment on or before **May 18, 2021**.
4. Federal Defendants shall file, if necessary, a Reply in Support of their Cross-Motion for Summary Judgment on or before **June 8, 2021**.

Respectfully submitted this 22nd day of December 2020.

*PLAINTIFFS KLAMATH-SISKIYOU
WILDLANDS CENTER, OREGON WILD,
AND CASCADIA WILDLANDS*

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CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2020, I electronically filed and served the foregoing Joint Proposed Scheduling Order on all counsel of record via the CM/ECF system.

/s/ Michelle M. Spatz
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